

SEALED**REDACTED****COPY**

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

2009 AUG 19 P 3 /3

UNITED STATES OF AMERICA,

Plaintiff,

v.

[REDACTED]
JOSE OMAR MARTINEZ (2)
GERARDO MARTINEZ (3),
VICTOR MONROE, aka "Slick" (4),
RAUL CRISTOBAL SANCHEZ,
aka "La Cebolla" (5),
[REDACTED]

ARON THEODORE HAYSLETT,
aka "Bizzy" (10),
[REDACTED]

DAVID CABELLO, aka "Hulk" (12),
[REDACTED]

ASHBY COWART (14),
CELESTINO GONZALEZ TORRES,
aka "Tino" (15),
[REDACTED]

RAMIRO VILLA, Sr. (17),
FRANCISCO ESPINOSA (18),
Gerardo ESPINOSA (19),
Edgar GUTIERREZ (20),
[REDACTED]

LUIS MOLINA (22),
DAVID TORRES, aka "Davo" (23)

Defendants

Case No: CR 09-670-FB
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SA09CR670-FB

INDICTMENT**DEPUTY**

- [D]Vio: 21 U.S.C. § 846; Conspiracy to Distribute Possess with intent to Distribute 5 kilograms or more of Cocaine and 1000 kilograms or more of Marijuana;
- [D]Vio: 18 U.S.C. § 1956(h); Conspiracy to Commit Money Laundering.]

THE GRAND JURY CHARGES:**COUNT ONE****[21 U.S.C. § 846]****[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]**

That beginning on or about August, 2008, the exact date unknown to the Grand Jury, and continuing until the date of the indictment in the Western District of Texas, the Southern District of Texas, the Southern District of Ohio, the Northern District Illinois and divers other places, Defendants,

[REDACTED]
JOSE OMAR MARTINEZ (2),
GERARDO MARTINEZ (3),
VICTOR MONROE, aka "Slick" (4),
RAUL CRISTOBAL SANCHEZ, aka "La Cebolla" (5),
[REDACTED]

ARON THEODORE HAYSLETT, aka "Bizzy" (10),
[REDACTED]

DAVID CABELLO, aka "Hulk" (12),
[REDACTED]

ASHBY COWART (14),
CELESTINO GONZALEZ TORRES, aka "Tino" (15),
[REDACTED]

RAMIRO VILLA, Sr. (17),
FRANCISCO ESPINOSA (18),
Gerardo ESPINOSA (19),
Edgar GUTIERREZ (20),
[REDACTED]

LUIS MOLINA (22),
DAVID TORRES, aka "Davo" (23)
[REDACTED]

and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with one another to distribute and possess

with intent to distribute controlled substances, which offenses involved Five Kilograms or more of Cocaine, a Schedule II Controlled Substance, and One thousand Kilograms or more of Marijuana, a Schedule II Controlled Substance contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and in violation of Title 21, United States Code, Section 846.

COUNT TWO
[18 U.S.C. § 1956(h)]

That beginning on or about August, 2008, the exact date unknown to the Grand Jury, and continuing until the date of the indictment in the Western District of Texas, the Southern District of Texas, the Southern District of Ohio, the Northern District Illinois and divers other places, Defendants,

[REDACTED]
JOSE OMAR MARTINEZ (2),
GERARDO MARTINEZ (3),
VICTOR MONROE, aka "Slick" (4),
RAUL CRISTOBAL SANCHEZ, aka "La Cebolla" (5),
[REDACTED]

ARON THEODORE HAYSLETT, aka "Bizzy" (10).
[REDACTED]

DAVID CABELLO, aka "Hulk" (12),
[REDACTED]

RAMIRO VILLA, Sr. (17),
[REDACTED]

and other persons to the Grand Jury known and unknown,

did unlawfully, knowingly and intentionally combine, conspire, confederate and agree, together, and with others known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Section 1956 , as follows:

a) to conduct and attempt to conduct financial transactions affecting interstate and foreign

commerce, described below, which involved property which was the proceeds of specified unlawful activity, to wit, the illegal distribution of controlled substances, with the intent to promote the carrying on of said specified unlawful activity, to wit: by transferring and delivering the proceeds of the illegal distribution of controlled substances across states and on into Mexico, so that the said proceeds could be enjoyed by those distributing the controlled substances and could be used to acquire more controlled substances for distribution, in violation of 18 U.S.C. § 1956(a)(1)(A)(i);

b) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, described below, which involved property which was the proceeds of specified unlawful activity, to wit, the illegal distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the said specified unlawful activity, to wit: by secretly transferring and delivering the proceeds of the illegal distribution of controlled substances across states and on into Mexico, so that the said proceeds could be anonymously enjoyed by those distributing the controlled substances and could be used to acquire more controlled substances for distribution, in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

c) to transport, transmit, and transfer and attempt to transport, transmit, and transfer monetary instruments, that is United States currency, from a place in the United States, to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, the illegal distribution of controlled substances, in violation of 18 U.S.C. § 1956(a)(2)(A);

d) to transport, transmit, and transfer and attempt to transport, transmit, and transfer monetary instruments, that is United States currency, from a place in the United States, to a place outside the United States, knowing that the monetary instruments involved represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed to in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit, the illegal distribution of controlled substances, the illegal distribution of controlled substances, in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators, known and unknown to the Grand Jury, committed and caused to be committed the following overt acts:

1. On or about July 16, 2008, [REDACTED] attempted to transport from Cincinnati, Ohio to San Antonio, Texas approximately \$38,100.00 in United States Currency for JOSE OMAR MARTINEZ and GERARDO MARTINEZ, which was proceeds from the distribution of cocaine and marijuana.

2. On or about On October 2, 2008 [REDACTED]

[REDACTED] and JOE JASSO attempted to transport from Cincinnati, Ohio to San Antonio,

Texas approximately \$88,600.00 in United States Currency for JOSE OMAR MARTINEZ, GERARDO MARTINEZ and VICTOR MONROE, aka "Slick", which was proceeds from the distribution of cocaine and marijuana.

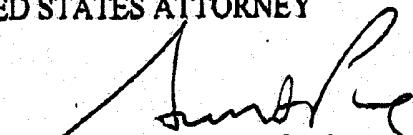
All contrary to Title 18, United States Code, Section 1956(a)(1), and in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL,

[REDACTED]
FOREPERSON OF GRAND JURY

JOHN E. MURPHY
UNITED STATES ATTORNEY

By:


SAM L. PONDER
Assistant United States Attorney